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September 3, 2024

VIA ECF

Hon. Jennifer H. Rearden
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Application GRANTED. The Clerk of Court is directed to strike ECF Nos. 50-4 and 50-5 and replace them with ECF Nos. 51-1 and 51-2. The Clerk of Court is further directed to terminate ECF No. 51.

SO ORDERED

Jennifer H. Rearden
Jennifer H. Rearden, U.S.D.J.
Dated: September 5, 2024

Re: *Chaperon, et al. v. Banks, et al.*, 24-cv-5135 (JHR)

Dear Judge Rearden:

I am an Assistant Corporation Counsel in the Office of Corporation Counsel, Muriel Goode-Trufant, Acting Corporation Counsel, attorney for Defendants New York City Department of Education ("DOE") and David C. Banks, in his official capacity as Chancellor of the DOE (collectively, "Defendants") in the above-referenced action.

I respectfully submit this letter and proposed attachments pursuant to the Court's Electronic Case Filing Rules & Instructions 27.1 (regarding mistaken filings containing confidential or sensitive information), as well as Rule 9 of Your Honor's Individual Rules and Practices in Civil Cases (regarding redactions and sealed filings). On the evening of Friday, August 30, 2024, I electronically filed Defendants' Motion to Dismiss the Complaint (ECF Nos. 48-50). After filing Defendants' motion, I noticed that redactions were not properly applied to Exhibits D and E to the Declaration in Support of Defendants' Motion to Dismiss (ECF No. 50). I apologize for this oversight.

Earlier today, I contacted the Court's ECF Helpdesk to correct this error. The Helpdesk has since temporarily sealed Exhibits D and E (ECF Nos. 50-4, 50-5). Pursuant to the Court's ECF Rule 27.1, Defendants now hereby request that Your Honor formally place ECF Nos. 50-4 and 50-5 under seal. Additionally, pursuant to Rule 9 of Your Honor's Individual Rules, Defendants attach here the proposed properly redacted copies of Exhibits D and E to the Declaration in Support of Defendant's Motion to Dismiss. Should the Court require it, Defendants will also re-file the Declaration with each of the properly redacted Exhibit attachments.

Thank you for considering this request.

Respectfully submitted,

/s/ Eric Teszler

Eric Teszler, Esq.

Assistant Corporation Counsel

cc: All counsel of record (via ECF)